

CUAUHTEMOC ORTEGA (Bar No. 257443)
Federal Public Defender
CRAIG A. HARBAUGH (Bar. No. 194309)
(E-Mail: Craig_Harbaugh@fd.org)
GEORGINA WAKEFIELD (Bar. No. 282094)
(E-Mail: georgina_wakefield@fd.org)
Deputy Federal Public Defenders
321 East 2nd Street
Los Angeles, California 90012-4202
Telephone: (213) 894-2854
Facsimile: (213) 894-0081

Attorneys for Defendant
THOMAS VINCENT GIRARDI

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS VINCENT GIRARDI,

Defendant.

Case No. 2:23-cr-00047-JLS-1

**UNOPPOSED EX PARTE
APPLICATION TO CONTINUE
MENTAL COMPETENCY
EVALUATION DEADLINES**

Thomas Vincent Girardi, through his counsel of record, Deputy Federal Public Defenders Craig Harbaugh and Georgina Wakefield, files his unopposed ex parte application to continue mental competency evaluation deadlines. This application is based on the attached declaration of counsel.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: May 22, 2023

By /s/ Georgina Wakefield

GEORGINA WAKEFIELD
Deputy Federal Public Defender

DECLARATION OF GEORGINA WAKEFIELD

I, Georgina Wakefield, declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am licensed to practice law in the State of California and I am admitted to practice in this Court.

2. On March 22, 2023, this Court entered an order for a mental competency evaluation. (Dkt. 54.) The order set the following deadlines:

a. Each expert's report filed with the Court under seal, with copies provided to counsel for defendant and for the government no later than May 26, 2023.

b. Defendant's motion regarding competency filed by June 16, 2023, the government's opposition, if any, filed by July 7, 2023, and any reply filed by July 21, 2023. The motion will be heard after the competency hearing, which will occur on August 3, 2023, or as soon thereafter as the Court is available.

3. The defense requires an additional week of time to submit its expert report. The government is not opposed to that request.

4. Accordingly, the following new schedule is proposed:

a. Each expert's report shall be filed with the Court under seal, with copies provided to counsel for defendant and for the government no later than June 2, 2023.

b. Defendant's motion regarding competency shall be filed by June 23, 2023, the government's opposition, if any, shall be filed by July 14, 2023, and any reply shall be filed by July 21, 2023. The date of the competency hearing shall remain scheduled for August 3, 2023, or as soon thereafter as the Court is available.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 22, 2023, at Los Angeles, California.

/s/ Georgina Wakefield
GEORGINA WAKEFIELD